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15 Attorneys for PLAINTIFF
ROBERT HUNTER BIDEN

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA
18 WESTERN DIVISION

19 ROBERT HUNTER BIDEN, an
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR FEBRUARY 24,
2025 FINAL PRE-TRIAL
CONFERENCE; DECLARATION
OF BRYAN M. SULLIVAN**

*[[Proposed] Order filed and served
concurrently herewith]*

Date: February 24, 2025
Time: 1:30 P.M.
Ctrm.: 10A

Judge: Hon. Stephen V. Wilson

5802142.1

**PLAINTIFF ROBERT HUNTER BIDEN'S REQUEST FOR COUNSEL TO APPEAR REMOTELY FOR
FEBRUARY 24, 2025 STATUS CONFERENCE; DECLARATION OF BRYAN M. SULLIVAN**

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Bryan M. Sullivan,
4 Esq., to appear remotely by way of videoconference (e.g. Zoom) for the Final Pre-
5 Trial Conference scheduled in this case for February 24, 2025 at 1:30 p.m. (the
6 “Conference”). Good cause exists to grant this request because Mr. Sullivan along
7 with Zachary Hansen, Esq., will be trial counsel on the case and has been involved in
8 all aspects of the case. (*See* Declaration of Bryan M. Sullivan, at ¶2.) However, at
9 this time, Mr. Sullivan is unable to be in the State of California on February 24, 2025,
10 due to the fact that he resides in Virginia and has family/child care obligations that
11 prevent him from traveling to California and attending the Conference in person at
12 that time. Mr. Hansen, who will be trial counsel with Mr. Sullivan on the case and
13 also has been involved in all aspects of the case will be appearing in person for the
14 Conference, so Plaintiff will have another attorney present in person for this
15 hearing. (*See* Declaration of Bryan M. Sullivan, at ¶3.) Accordingly, Plaintiff
16 respectfully requests that the Court grant this request for Mr. Sullivan to appear
17 remotely by videoconference at the February 24, 2025 Conference in this matter.

18 Dated: February 11, 2025

EARLY SULLIVAN WRIGHT
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21 By: /s/ Zachary C. Hansen

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Attorney for Plaintiff
Robert Hunter Biden

DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for February 24, 2025 Final Pre-Trial Conference. If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in all aspects of this case and will be trial counsel for this with my colleague Zachary Hansen, Esq., and my participation in the Final Pre-Trial Conference is, therefore, necessary.

3. I am unable to be in the State of California on February 24, 2025, I reside in Virginia and have family/child care obligations that week that prevent me from traveling to California and attending the Conference in person. However, my colleague, Mr. Hansen, who will be trial counsel on this case will be appearing in person for the Status Conference, so Plaintiff will have another attorney present for this hearing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 11th of February, 2025, at Roanoke, Virginia.

/s/ Bryan M. Sullivan
Bryan M. Sullivan